

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION  
Case No. 1:15-cv-00109-MR**

SANDRA M. PETERS, on behalf of  
herself and all others similarly  
situated,

Plaintiff,

v.

AETNA INC., AETNA LIFE  
INSURANCE COMPANY, and  
OPTUMHEALTH CARE SOLUTIONS,  
INC.,

Defendants.

**JOINT STATUS UPDATE**

Pursuant to the Court’s December 28, 2023 text-only order, Plaintiff Sandra Peters (“Plaintiff”) and Defendants OptumHealth Care Solutions, Inc., Aetna Inc., and Aetna Life Insurance Company (collectively “Defendants”) jointly provide the Court with the following update on the parties’ settlement efforts.

Since December 28, the parties have had further telephonic meetings pursuant to Federal Rule of Evidence 408 to discuss potential resolution. As stated in the parties’ previous joint status update, Aetna made its supplemental data production on November 2. Optum is continuing to evaluate that data and working on making its corresponding supplemental data production, which data will provide the parties with information about potential class members.

Although the parties recognize that any final settlement agreement will have to account for the full updated information about the classes once it becomes available, the parties have continued to discuss the structure and content of a potential settlement agreement. Based on that back-and-forth, Plaintiff expects to send Defendants her opening settlement demand next week, at the latest.

Given this forward progress, the parties propose to provide the Court with another status update on February 16, 2024, and to indicate whether the parties wish to proceed with a status conference before the Court or whether the settlement negotiations are progressing such that continued efforts toward a settlement may serve judicial and litigation efficiency.

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**CERTIFICATE OF SERVICE**

I certify that on January 19, 2024, I filed and served a copy of the Joint Status Report using the CM/ECF system, which will give notice to counsel of record.

/s/ David M. Wilkerson

David M. Wilkerson